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11 Joseph Teixeira

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CITY OF INGLEWOOD, a public entity, ) Case No. 2:15-cv-01815-MWF-MRW

Plaintiff,

17 vs.  
18 JOSEPH TEIXEIRA and Does 1-10,

## Defendants.

Assigned to the Hon. Michael Fitzgerald

**DECLARATION OF JOSEPH  
TEIXEIRA IN SUPPORT OF  
DEFENDANT'S MOTION TO  
DISMISS (F.R.C.P. 12(b)(6)) AND  
MOTION TO STRIKE (F.R.C.P.  
12(f)); EXHIBIT B**

Hearing Date: June 22, 2015  
Time: 10:00 a.m.  
Courtroom: 1600

[Notice of Motion and Motion to Dismiss (Rule 12(b)(6)); Notice of Motion and Motion to Strike (Rule 12(f)); Request For Judicial Notice; Declaration Of Dan Laidman; Notice Of Lodging Of DVDs with Exs. A, C-F; Notice Of Manual Filing; and [Proposed] Orders Filed Concurrently]

{ Action Filed: March 12, 2015

## **DECLARATION OF JOSEPH TEIXEIRA**

I, Joseph Teixeira, declare and state as follows:

1. I am the defendant in this action. I am over eighteen years of age. I have personal knowledge of the facts contained in this declaration, except for those matters stated on information and belief, which I am informed and believe to be true. If called upon to testify, I could and would competently testify to these facts.

2. I have reviewed the Complaint in this action. Paragraph 19 references and links to the Internet addresses for six YouTube pages. These YouTube pages display videos that I created and posted to YouTube under an account that I maintain with the name "Dehol Truth."

3. Attached as **Exhibit A** to the concurrently submitted Notice of Lodging is a DVD containing true and correct copies of these six videos that I created and posted to YouTube, and that are referenced and linked to in Paragraph 19 of the Complaint. In particular:

a. **Exhibit A-1** (Video One): This video is available at

<https://www.youtube.com/watch?v=UyCqRiZXRH8>. I created this video and posted it to YouTube at that address. It is titled “James Butts Accuses The City Clerk Of Election Fraud,” or “James T. Butts Jr. Accuses City Clerk Yvonne Horton of Election Fraud!”

b. **Exhibit A-2** (Video Two): This video is available at

<https://www.youtube.com/watch?v=ZruE0a1UF8g>. I created this video and posted it to YouTube at that address. It is titled “James T. Butts Jr. Misleads the Public About His Voter Registration.”

c. **Exhibit A-3** (Video Three): This video is available at

<https://www.youtube.com/watch?v=gUUZdTNe7CA>. I created this video and posted it to YouTube at that address. It is titled “Lying Politicians,” or “James T Butts Jr Alibi or apology.”

1                   d. **Exhibit A-4** (Video Four): This video is available at  
2                    <https://www.youtube.com/watch?v=-5VQZrW7BVY>. I created this  
3                    video and posted it to YouTube at that address. It is titled “James T.  
4                    Butts Jr. exploits the Murder of Fredrick Martin for his own political  
5                    benefit.”

6                   e. **Exhibit A-5** (Video Five): This video is available at  
7                    <https://www.youtube.com/watch?v=MZKTIutCjdI>. I created this video  
8                    and posted it to YouTube at that address. It is titled “Mayor James Butts  
9                    Lies About Being a Hypocrite.”

10                  f. **Exhibit A-6** (Video Six): This video is available at  
11                  <https://www.youtube.com/watch?v=a1p3l0OmhGM>. I created this  
12                  video and posted it to YouTube at that address. It is titled “Inglewood  
13                  Mayor James Butts Lies, Hiding Dangerous Traffic Problems At The  
14                  Forum,” or “Mayor James T Butts Jr Lies, Hiding Dangerous Traffic  
15                  Problems After Forum Event!”

16                  4. True and correct copies of screenshots of these YouTube pages from my  
17                  account which are referenced and linked to in Paragraph 19 of the Complaint, and  
18                  which display the videos that I created that are contained in Exhibit A, are attached  
19                  as **Exhibit B** to this Declaration. In particular:

20                  a. **Exhibit B-1** (Video One): This is a screenshot of the web page  
21                  <https://www.youtube.com/watch?v=UyCqRiZXRH8>.

22                  b. **Exhibit B-2** (Video Two): This is a screenshot of the web page  
23                  <https://www.youtube.com/watch?v=ZruE0a1UF8g>.

24                  c. **Exhibit B-3** (Video Three): This is a screenshot of the web page  
25                  <https://www.youtube.com/watch?v=gUUZdTNe7CA>.

26                  d. **Exhibit B-4** (Video Four): This is a screenshot of the web page  
27                  <https://www.youtube.com/watch?v=-5VQZrW7BVY>.

1                   e. **Exhibit B-5** (Video Five): This is a screenshot of the web page

2                    <https://www.youtube.com/watch?v=MZKTIutCjdI>.

3                   f. **Exhibit B-6** (Video Six): This is a screenshot of the web page

4                    <https://www.youtube.com/watch?v=a1p3l0OmhGM>.

5               5. As referenced in Paragraph 19 of the Complaint and as reflected in

6               Exhibit A-1 and Exhibit A-2, Video One and Video Two include clips from the July  
7               20, 2010 Inglewood City Council meeting. A true and correct copy of the City's  
8               official video recording of this Council meeting, which I obtained from the City of  
9               Inglewood, is included on the DVDs attached as **Exhibit C** to the concurrently  
10               submitted Notice of Lodging.

11               6. As referenced in Paragraph 19 of the Complaint and as reflected in

12               Exhibit A-3, Video Three includes clips from the May 22, 2012 Inglewood City  
13               Council meeting. A true and correct copy of the City's official video recording of  
14               this Council meeting, which I obtained from the City of Inglewood, is included on  
15               the DVDs attached as **Exhibit D** to the concurrently submitted Notice of Lodging.

16               7. As referenced in Paragraph 19 of the Complaint and as reflected in

17               Exhibit A-6, Video Six includes clips from the February 11, 2014 Inglewood City  
18               Council meeting. A true and correct copy of the City's official video recording of  
19               this Council meeting, which I obtained from the City of Inglewood, is included on  
20               the DVD attached as **Exhibit E** to the concurrently submitted Notice of Lodging.

21               The City's official video recording of the February 11, 2014 City Council meeting  
22               video is also available on the City of Inglewood's YouTube page at  
23               [https://www.youtube.com/watch?v=PDwvv2XBu\\_8](https://www.youtube.com/watch?v=PDwvv2XBu_8).

24               8. As referenced in Paragraph 19 of the Complaint and as reflected in

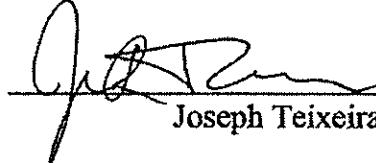
25               Exhibit A-5, Video Five includes clips from the April 23, 2013 Inglewood City  
26               Council meeting. I do not have a copy of the City's official video recording of this  
27               Council meeting, but I am informed and believe that a copy of this video is included  
28               on the DVD attached as Exhibit F to the concurrently submitted Notice of Lodging.

1 On April 1, 2015, I submitted a request to the City under the California Public  
2 Records Act (“CPRA”) for a copy of this video, and for copies of all of the other City  
3 Council meeting videos identified in the City’s Complaint at page 9 (Complaint  
4 “Exhibit A”). As of the signing of this Declaration I have not received a response to  
5 this request.

6 9. Paragraph 19 of the Complaint indicates that Video Four includes clips  
7 from an April 11, 2013 Inglewood City Council meeting. I believe that this is a  
8 mistake based on an erroneous reference in Video Four to an April 11 date, and that  
9 the Inglewood City Council did not hold a meeting on that date. I believe that Video  
10 Four includes footage from a video recording of an April 9, 2013 meeting of the  
11 Inglewood City Council. I do not have a copy of the City’s official recording of the  
12 April 9, 2013 Council meeting. I submitted a CPRA request to the City for a copy of  
13 this video on April 7, 2015. As of the signing of this Declaration I have not received  
14 a response to this request.

15 10. On April 1, 2015, I submitted a CPRA request to the City for copies of  
16 the copyright registration applications that are identified in the City’s Complaint at  
17 page 9 (Complaint “Exhibit A”). As of the signing of this Declaration I have not  
18 received a response to this request.

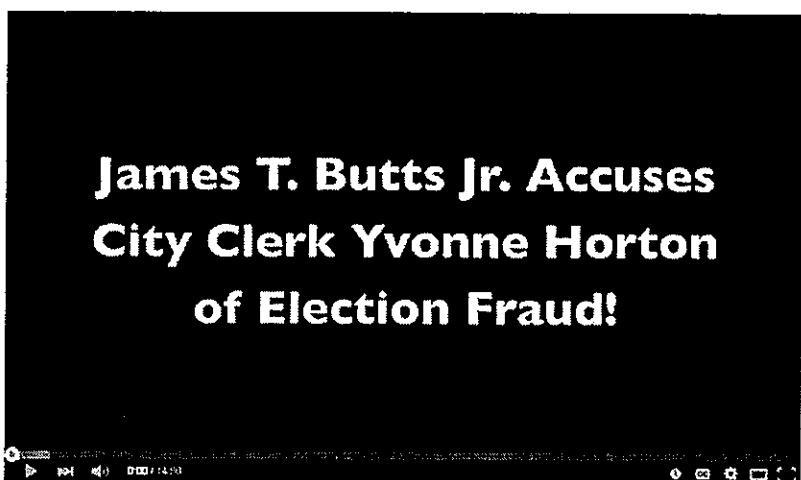
19 I declare under penalty of perjury under the laws of the United States of  
20 America that the foregoing is true and correct, and that this declaration was executed  
21 this 13<sup>th</sup> day of April 2015, at Inglewood, California.

22   
23 Joseph Teixeira  
24  
25  
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28

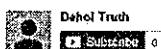
**MANUALLY LODGED, NOTICE OF LODGING**  
**EXHIBIT A**

# **Exhibit A**

## **EXHIBIT B**



### James Butts Accuses The City Clerk Of Election Fraud



Dehol Truth

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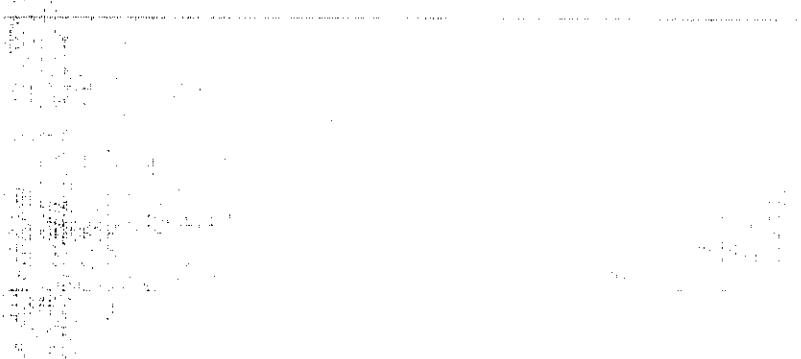
[Published on Feb 15, 2014](#)

Then candidate James T. Butts Jr. apparently accuses Inglewood City Clerk Yvonne Horton and/or her staff of Election Fraud while he breaks just about every City Council rule he can.

See more of his bizarre behavior at: <http://inglewoodwatchdog.vix.com/>...

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Comments are disabled for this video.



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James Butts exploits the murder of Fredrick Martin for his own political gain  
by Dehol Truth  
301 views



James T. Butts Jr. Misleads the Public About His Voter Registration.  
by Dehol Truth  
301 views



May 11, 2013 Detroit City Clerk Debate between D. Eric Wilcoxson and Janice  
by 301viewsCityClerk  
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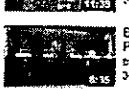
James T. Butts Jr. Alibi or apology  
by Dehol Truth  
301 views



Former City Clerk, Stephanie Hines, confronts Board of Aldermen after  
by Pacific Press  
545 views



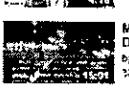
Mayor James Butts Lies About Being a Hypocrite  
by Dehol Truth  
301 views



Brown Act Violations By The Inglewood Planning Commission, August 6th 2014  
by Dehol Truth  
301 views



Steven Seagal: If The Truth Came Out, Obama Would Be Impeached  
by Western Journalism  
3,037,235 views



Mayor James T. Butts Jr. Lies, Hiding Dangerous Traffic Problems After Forum  
by Inglewood Watchdog  
301 views



City clerk insults Christian Community  
by Christian4Gv  
618 views



James T. Butts Jr. Violates The Law To Get Reelected #2  
by Inglewood Watchdog  
216 views



Butts has a fit at the Block Club Captains meeting  
by Eu Fleming  
601 views



James Butts Lies Hiding Dangerous Traffic Problems After Forum Events 2  
by Inglewood Watchdog  
174 views



DEATH BY BUTT-SHOT: NJ Woman CHARGED With MANSLAUGHTER in Death of Her Husband  
by Heavys Metalix  
6,575 views



@Twitter accuses Beyoncé of shutting down 105 & park - AJ & FREE speak on it  
by loveis2012  
32,019 views



Baby got Back 2013 Keys on Main SLC.mp4  
by James Cole Smith  
651 views



The Parcells - What Are Boys Made Of - 1963 His Master's Voice - POP 1154  
by One Way Win 4444  
331 views



Senator David Norris recommends giving HOMOPHOBES a kick up the arse!  
by Mick's Memorable  
335 views



OUT OF BOUNDS EP. 7: Kissing 50 Cent, Metta World Punishment, Rodman hits  
by OutOfBoundsLIVE  
561 views

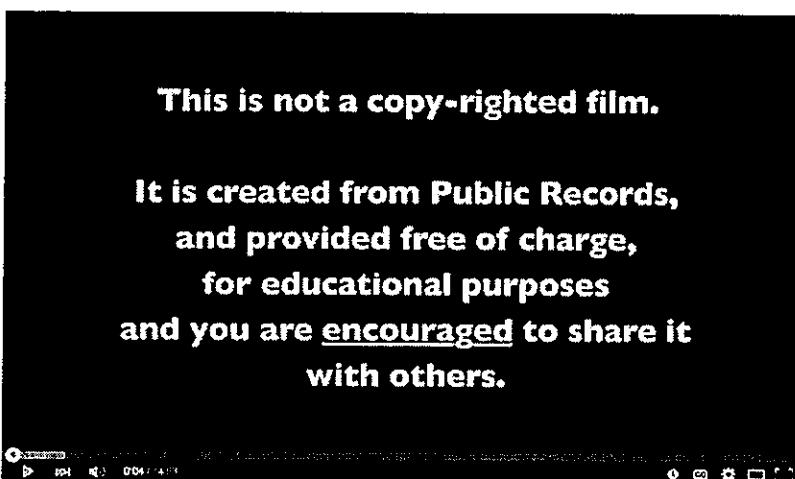


Standing My Ground Against The Corruption In The Inglewood City  
by atm2000  
247 views

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### James T. Butts Jr. Misleads the Public About His Voter Registration.



301+ views

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Published on May 24, 2014

On July 20, 2010, "Mayoral Candidate" James Butts misled Inglewood's voters to hide the fact that he was not responsible enough to file his election documents on time. See more of his bizarre behavior at: <http://inglewoodwatchdog.wix.com/any...>Category: News & Politics  
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James T. Butts Jr Alibi or apology  
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by Inglewood's Watchdog  
174 viewsSAM "MAGIC SAM" BUTTS PRAISE BREAK (NHCC PRAISE BUMP)  
by Ed Fanning  
336 viewsInglewood Street Tech - Darren Roth - General Foreman - Mayor James T. Butts  
by Inglewood's Watchdog  
286 viewsSTADIUM APPROVED!!! "Rams 2 Inglewood" (Raw Video)  
by RockstarRams  
1,055 viewsJames Butts exploits the murder of Fredrick Martin for his own political  
by Dehol Truth  
154 viewsInglewood's Illiterate Council "man" George Dotson Quickly Leaves the Room  
by Ed Fanning  
70 viewsInglewood Mayor James T. Butts on Stan Kroenke's NFL Stadium being shovel  
by Eric Geller  
220 viewsConsumer Report: racial retaliation by Hyundai Motor America  
by RockstarRams  
15,172 viewsMayor Butts at Inglewood Town Hall  
by Ed Fanning  
35 viewsSuper #1 Movie CLIP - No Cuts, No Buts (2010) HD  
by MD10CLIPS  
116,931 viewsJames T. Butts Inglewood, City of Inglewood Daniel Tabor Mayor Race  
by InglewoodRex70  
350 viewsInglewood Mayor Race Candidate James T. Butts run off with Inglewood Mayor  
by JamesButts4ever  
445 views

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# "Lying Politicians"

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Butts has a fit at the Block Club Captains meeting  
by Ed Fiering  
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Rev. Dr. Calvin O. Butts III Interviewed by Julian Bond: Explorations in Black  
by University of Atlanta  
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James Butts Accuses The City Clerk Of Election Fraud  
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Mayor James T Butts Jr Lies, Hiding Dangerous Traffic Problems After Forum  
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Inglewood Street Tech - Darren Roth - General Foreman - Mayor James T. Butts  
by Inglewood City  
293 views

James T. Butts Jr. Misleads the Public About His Voter Registration.  
by Detol Truth  
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James T Butts Jr Violates The Law To Get Relected #2  
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James Butts exploits the murder of Fredrick Martin for his own political gain  
by Detol Truth  
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Mayor James Butts Lies About Being a Hypocrite  
by Detol Truth  
321 views

Brown Act Violations By The Inglewood Planning Commission, August 6th 2014?  
by Detol Truth  
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sam butts j/o House of blues/ remnant  
by Inglewood Entertainment  
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James Butts Lies Hiding Dangerous Traffic Problems After Forum Events 2  
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SAM "MAGIC SAM" BUTTS PRAISE BREAK (NHCC PRAISE BUMP)  
by Veed Entertainment  
3,476 views

STADIUM APPROVED!!!! "Rams 2 Inglewood" (Raw Video)  
by PackardFarms  
1,255 views

James T. Butts Inglewood, City of Inglewood Daniel Taylor Mayor Race  
by InglewoodRecords  
500 views

Mayor Butts at Inglewood Town Hall  
by Ed Fiering  
35 views

James T. Butts, and two councilmembers -Padilla & Franklin Leave while Maxine  
by Ed Fiering  
55 views

Inglewood Mayor James T. Butts on Stan Kroenke's NFL Stadium being shovel  
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220 views

Mayor's Town Hall Meeting  
by Inglewood Today Newspaper  
135 views

Consumer Report: racial retaliation by Hyundai Motor America  
by InglewoodRecords  
55,172 views

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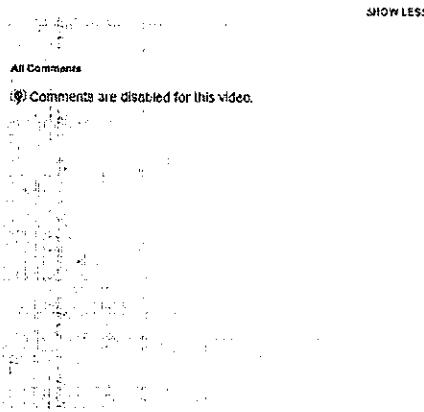
**James T. Butts Jr.  
exploits the Murder of  
Fredrick Martin  
for his own political benefit.**

James Butts exploits the murder of Fredrick Martin for his own political benefit

Debol Truth  301+ views  

Published on Mar 3, 2014  
Short documentary about the tragic murder of Inglewood resident Fredrick Martin and how an unethical politician, James Butts, apparently exploited the death to gain national publicity for himself, only to later completely abandon his guarantees that the killers would be brought to justice. See more of his bizarre behavior at: <http://inglewoodwatchdog.wix.com/butts>...

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 Butts has a fit at the Block Club Captains meeting by Ed Fleming 593 views  

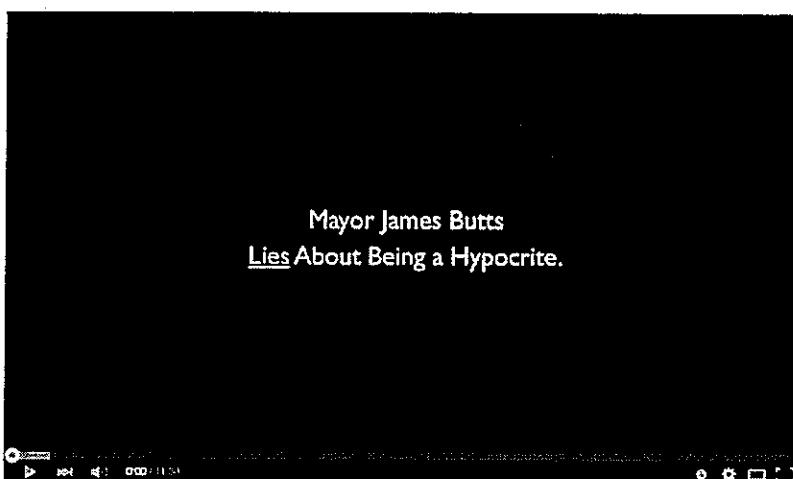
 Victoria's Secret Model Adriana Lima Reveals a Lights Out Moment | PEOPLE by PEOPLE 1,424 views  

 Mayor Butts at Inglewood Town Hall by Ed Fleming 65 views  

 Jack Straw says about you "LET THE CUNTS HAVE IT!" by karendickson 264 views  

 James T. Butts Inglewood, City of Inglewood Dentel Tabor Mayor Race by InglewoodWatchdog 360 views  

 James T. Butts, and two councilmembers — Pedillo & Franklin Leave while Maxine by Ed Fleming 65 views  



### Mayor James Butts Lies About Being a Hypocrite



Dehol Truth

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Published on Sep 28, 2014

After being publicly exposed as the worst kind of a hypocrite, James Butts desperately tries to lie to defend himself. Unfortunately, he can't make the video evidence go away.

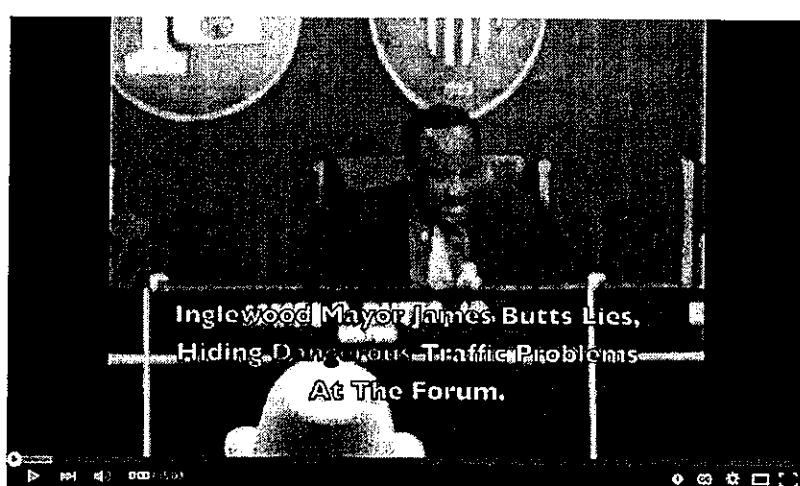
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10 comments



### Mayor James T Butts Jr Lies, Hiding Dangerous Traffic Problems After Forum Events

Inglewood's Watchdog  
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301+ views

Published on Sep 12, 2014  
More video evidence that James T. Butts Jr. will lie, and endanger the safety of the public, just to make himself look good

Category Education  
License Standard YouTube License

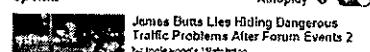
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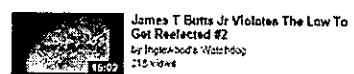
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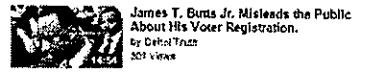
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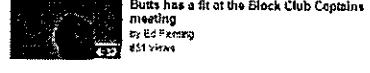
James Butts Lies Hiding Dangerous Traffic Problems After Forum Events 2  
by Inglewood's Watchdog  
174 views



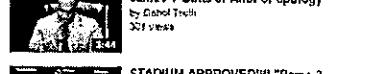
James T Butts Jr Violates The Law To Get Relected #2  
by Inglewood's Watchdog  
215 views



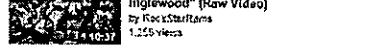
James T. Butts Jr. Misleads the Public About His Voter Registration.  
by Ed Fleming  
501 views



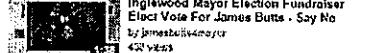
Butts has a fit at the Block Club Captains meeting  
by Ed Fleming  
451 views



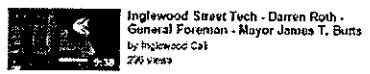
James T Butts Jr Alibi or apology  
by Ed Fleming  
327 views



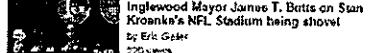
STADIUM APPROVED!!!! "Rams 2 Inglewood" (Raw Video)  
by RockStarTarts  
1,255 views



Inglewood Mayor Election Fundraiser Elect Vote For James Butts - Say No to JamesButts4Mayor  
by JamesButts4Mayor  
431 views



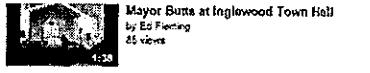
Inglewood Street Tech - Darren Roth - General Foreman - Mayor James T. Butts  
by Inglewood Cal  
246 views



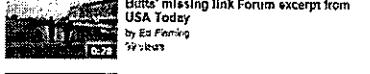
Inglewood Mayor James T. Butts on Stan Kroenick's NFL Stadium being shovelfed  
by Eric Geller  
220 views



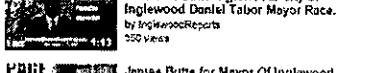
DOORKA HAWEENKA Qiso Naxdale SOO SAARISTI AMAL KAYSE 07 09 2014  
by Sosan Charki  
147,426 views



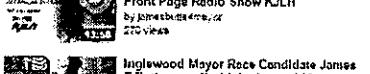
Mayor Butts at Inglewood Town Hall  
by Ed Fleming  
45 views



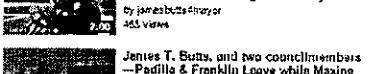
Butts' missing link Forum excerpt from USA Today  
by Ed Fleming  
99 views



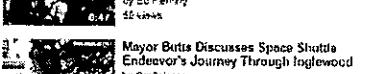
James T. Butts Inglewood, City of Inglewood Daniel Tabor Mayor Race.  
by InglewoodReports  
550 views



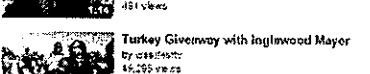
James Butts for Mayor of Inglewood Front Page Radio Show KJLH  
by jonesbutts4mayor  
220 views



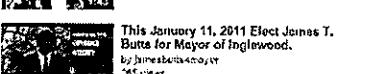
Inglewood Mayor Race Candidate James T Butts runs off with Inglewood Mayor  
by jonesbutts4mayor  
455 views



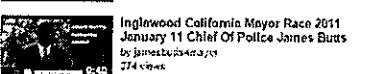
James T. Butts, and two councilmembers - Padilla & Franklin Leave while Maxine  
by Ed Fleming  
45 views



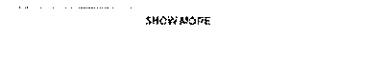
Mayor Butts Discusses Space Shuttle Endeavor's Journey Through Inglewood  
by CalScience  
481 views



Turkey Giveaway with Inglewood Mayor  
by Ed Fleming  
45,205 views



This January 11, 2011 Elect James T. Butts for Mayor of Inglewood.  
by JamesButts4Mayor  
265 views



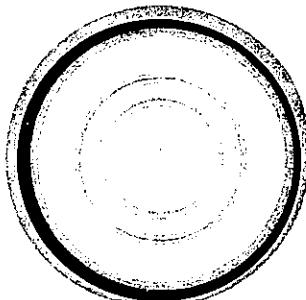
Inglewood California Mayor Race 2011 January 11 Chief Of Police James Butts  
by JamesButts4Mayor  
274 views

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**MANUALLY LODGED, NOTICE OF LODGING**  
**EXHIBIT C**

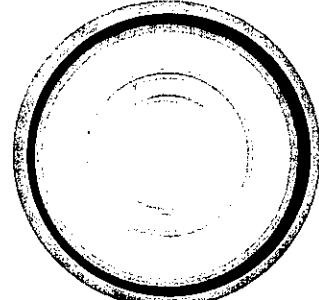
# **Exhibit C**

## **Part 1**



# **Exhibit C**

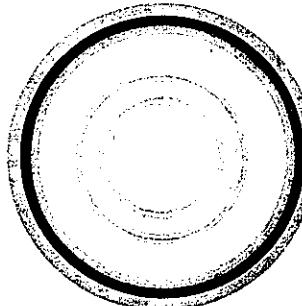
## **Part 2**



**MANUALLY LODGED, NOTICE OF LODGING**  
**EXHIBIT D**

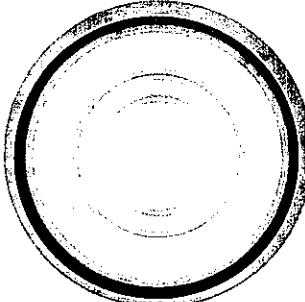
# **Exhibit D**

## **Part 1**



# **Exhibit D**

## **Part 2**



**MANUALLY LODGED, NOTICE OF LODGING**  
**EXHIBIT E**



**Exhibit E**